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May 4, 1997

Edgewood Senior High School
ATTN: Student Council
2428 Blake Rd.
Ashtabula, OH
44004

Secretary
Federal Communications Commission
Washington, DC 20554

Dear Sir:

Enclosed in this envelope are the formal comments of the Edgewood Senior High School Student Council in GC Docket No. 97-113. Please date stamp and have Secretary Caton sign the enclosed postage-paid postcard and return it via U.S. mail. Thank you for your time.

Sincerely,

Stephen Kellat

Stephen Kellat
Internet Committee Chairman

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Before the
Federal Communications Commission
Washington, DC 20554

In Matter Of)
)
Electronic Filings of) GC Docket No. 97-113
Documents in Rulemaking)
Proceedings)

To: The Commission

COMMENTS OF EDGEWOOD SENIOR HIGH SCHOOL STUDENT COUNCIL

The Edgewood Senior High School Student Council, on behalf of the student body numbering 685 students, does submit its comments in this proceeding. This response was prepared by the Internet Committee of this council. The members of this committee are Stephen Kellat, Committee Chairman, Joe Donatone, Michelle Falcione, Chad Colby, Kym Nicholas, K.D. Doyle, and Jacob Nolan. Assisting with the proofreading of our work were senior Michael West and English teacher Mrs. Applebee.

Our response to this Notice of Proposed Rule Making shall deal with the issues of establishing a method to file comments formally via the Internet, acceptable file format, size limits of comments filed, determining date of receipt, and security measures to insure authenticity.

Filing Formal Comments Via the Internet

The student body concurs with the overall idea of this proposal. The student body would save much time, money and effort if this submission method was made legally permissible.

Method of Filing Comments

The student body agrees with the commission's proposed submission interface. Committee chairman Kellat, a licensed amateur radio operator, believes that this is the best utilization of the limited resources of this commission.

File Formats to Accept

The student body is split in opinion over file formats. Chairman Kellat suggests using ASCII text because of it being universally understood by computers and programs.

Limits on File Size

The student body believes that a limit of five pages for comments filed via these means is sufficient due to the errors that can occur during transmission between the submitting computer and the commission's computer.

Determination of Date of Receipt

The student body concurs with the commission's proposal. Due to concerns of Internet congestion, this committee suggests review of this rule in two years so as to compensate for possible increased congestion.

Security Measures to Ensure Comment Authenticity

Committee Chairman Kellat suggests a method to ensure authenticity by creating a system that would accept the

comments and then give a serial number to the commenting party. The comments submitted would be temporarily withheld from public file until verification of authenticity is received. The commenting party would certify authenticity by signing a form showing the serial number of their comments. The commenting party would then send the form to the office of the Secretary prompting an employee at said office to transfer the comments to the necessary offices and move it to public record. If the comments were found to be forged, the authenticity certification form could be used to bring charges of falsification of documents against the party committing the act. This would make authenticity enforceable and possible.

Conclusion

The student body of Edgewood Senior High School concurs with the proposals presented. We wish this method of filing made permissible. This student body requests that the security measures detailed herein be implemented also.

Respectfully submitted,

Edgewood Senior High School Student Council
By Student Council Internet Committee
2428 Blake Rd.
Ashtabula, Ohio
44004